

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

IN RE:) CHAPTER 13
)
RICHARD LAND,) Bankruptcy No. 19-01485
)
SARA PORTER LAND,) REQUEST TO USE FUNDS FOR
) REASONABLE AND NECESSARY
) EXPENSES
)

COME NOW Debtor(s), through counsel, and request that the Court enter an order allowing the use of 2019 tax refunds for reasonable and necessary expenses as follows.

1. Debtor(s) received a 2019 federal tax refund of \$6,654.00 and a 2019 state refund of \$810.00.
2. Debtors turned over \$3,600 as required by the plan.
3. Debtor(s) request that they be allowed to keep their tax refunds to offset past or potential future loss of wages and other expenses related to COVID-19. The possibility of loss of income and expenses continues to be an ongoing concern for the foreseeable future.
4. If plan payments are delinquent, Debtor(s) will amend their plan to address that issue.
5. Without these funds, Debtor(s) face the potential failure of their Chapter 13 plan.

WHEREFORE, Debtor(s) request that the Court enter an Order allowing them to retain the 2019 tax refund(s) in the amount of \$3,864.00 for these extraordinary and necessary expenses.

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